

UNITED STATES DISTRICT COURT
for the
District of Maryland

United States of America

v.

JOHN FRANKLIN,
DWAYNE FRAZIER, and
TROY WILLIAMS

Defendant(s)

)

Case No.

10-3807 JKB

thru

10-3809 JKB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 14, 2010 in the county of Baltimore City in the
Maryland, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. section 371

Conspiracy to Commit Carjacking

This criminal complaint is based on these facts:

Continued on the attached sheet.


Complainant's signature

Michael Glenn, Task Force Officer*Printed name and title*

Sworn to before me and signed in my presence.

Date:

10/7/10
Judge's signature

City and state:

Baltimore, Maryland

James K. Bredar, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael Glenn, being duly sworn, do hereby solemnly swear and affirm:

1 I am currently assigned to the Baltimore City Police Department as a Detective and have been employed with the Department since December 14, 1988. I have been detailed to the Bureau of Alcohol, Tobacco and Firearms and Explosives, United States Department of Justice as a Task Force Officer since October of 2002. Prior to this assignment, I was assigned to the Baltimore City Police Homicide Unit for 7 ½ years and have investigated numerous homicide's involving firearms as the cause of death. I was also a member of the Baltimore City Police Department's S.W.A.T. Team for five years where specialized training was obtained in the use of firearms and equipment. I have received specialized training in the investigation of violations of federal/state firearms laws. In my current capacity I am responsible for the investigation of federal/state firearms violations and the investigation of violent drug and gun trafficking organizations. I am an active investigator for the EXILE program in which state and local arrests for firearms violations are reviewed and referred for possible federal prosecution.

2 This affidavit is in support of a Complaint against JOHN FRANKLIN, DWAYNE FRAZIER, and TROY WILLIAMS. This affidavit is based upon my conversations with other law enforcement officers and other individuals and my review of relevant documents. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of this investigation. Where the contents of documents, and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3 Based on interviews with Officers of the Baltimore City Police Department ("BPD") and a review of records maintained by the BPD, I have learned the following:

On August 14, 2010, at 11:36 p.m., a BPD Officer responded to the 400 block of N. Madeira Street in Baltimore City, Maryland for the report of an armed carjacking. Upon his arrival at the scene, the Officer was met by the victim of the carjacking. The victim stated that he was driving his green 1996 Buick LeSabre, Maryland temporary tag no. 00119M, in the 100 block of Baltimore Street when he was waved down by a male, later identified as defendant JOHN FRANKLIN, a/k/a Devin BOYD. FRANKLIN informed the victim that he needed a hack (an unlicensed cab ride) and wanted to go to Lombard Street. After the victim had stopped the vehicle, FRANKLIN and two other males entered the victim's vehicle. FRANKLIN sat in the front passenger seat. The other two males were later identified as defendants DWAYNE FRAZIER, who was seated behind the victim/driver, and TROY WILLIAMS, who was seated behind FRANKLIN.

The victim advised that while he was driving in the 400 block of N. Madeira Street, FRAZIER, who was seated behind him, pointed a handgun in his right side. WILLIAMS, who was seated behind the front passenger seat, stated, "Give us everything. Don't worry, we will bring your car back to you at this location. If not we will take it to your house for you." FRANKLIN then grabbed the victim's


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belongings (one Apple I-phone, one SIM card, \$60.00 in U.S. currency, and the victim's driver's license). After FRANKLIN had taken the victim's property he ordered the victim out of the vehicle. After the victim had exited the vehicle all three defendants drove away in the victim's vehicle.

Approximately ten minutes later, at approximately 11:45 p.m., a female had just parked her red 2006 Dodge Charger, Maryland tag no. A164796, in the parking lot of the 4000 block of E. Lombard Street in Baltimore City, Maryland. The female was accompanied with her two friends when they were approached by a green Buick LaSabre with a temporary tag in the rear window. The Buick LaSabre pulled in front of the Dodge Charger and stopped. The Buick LaSabre was occupied by three males. Two of the males exited the Buick and were later identified as defendants FRANKLIN and WILLIAMS. FRANKLIN and WILLIAMS approached the three females at which time WILLIAMS brandished a stainless steel .357 handgun from the front of his pants and pointed the firearm at the females. WILLIAMS then ordered, "Give us everything - your money, your cell phones, everything." One of the females began handing WILLIAMS her property when FRANKLIN grabbed one of the other females and rummaged through her pockets checking for property, but did not find anything. WILLIAMS became agitated and ordered one of the females to give him the keys to the 2006 Dodge Charger. The female complied, at gun point, and FRANKLIN and WILLIAMS entered the vehicle and drove southbound in the 100 block of Haven Street.

A few minutes later, at approximately 11:49 p.m., a call was dispatched for Officers to respond to Haven Street and E. Lombard Street for an armed carjacking involving a 2006 Dodge Charger. During the dispatching of this call, a BPD Sergeant was in the 100 block of S. Linwood Avenue in Baltimore City, Maryland when he observed a red Dodge Charger, bearing Maryland no. A164796, being followed by a green Buick LeSabre with a temporary tag. The Sergeant followed the vehicles westbound on the 2600 block of Fayette Street in Baltimore City and requested additional units for assistance. Another BPD Officer arrived and activated the emergency lights and siren on his police vehicle. The two vehicles accelerated with the Dodge Charger traveling southbound in the 100 block of S. Patterson Park Avenue in Baltimore City, and the Buick LeSabre traveling northbound in the 200 block of S. Montford Avenue in Baltimore City. The Officers continued to follow the vehicles. The Buick LeSabre was finally stopped in the 700 block of N. Montford Avenue in Baltimore City after additional police units responded. FRAZIER was observed by Officers operating the vehicle and was placed under arrest. Another Officer followed the red Dodge Charger to the 200 block of Essex Street in Baltimore City, at which time the Dodge Charger struck a parked vehicle and defendants WILLIAMS and FRANKLIN bailed out of the Dodge Charger and fled the area on foot. Additional Officers responded to the area with the help of the BPD's helicopter unit ("FOXTROT"). Defendant WILLIAMS was located under a parked vehicle in the 700 block of S. Patterson Park Avenue, and defendant

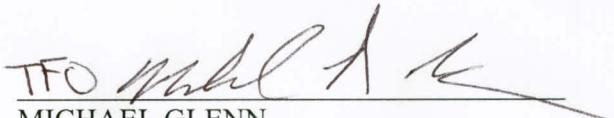


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FRANKLIN was located in the 700 block of Van Lill Street. Defendant FRANKLIN had in his possession upon his arrest the driver's license belonging to the victim/owner of the Buick LeSabre. In addition, the stainless steel .357 caliber Taurus Magnum six shot revolver (fully loaded), serial # 01326507, was recovered lying next to a basement door of 707 Van Lil Street with a bag containing a black ski mask, gloves, several vials of packaging materials, and a cell phone belonging to one of the female victims from the second carjacking.

Based on an initial investigation of the vehicles, it has been determined that the two aforementioned vehicles were manufactured outside of the State of Maryland and, therefore, were transported, shipped, and received in interstate commerce prior to the incidents described above.

4 Based on the foregoing, I respectfully submit that there is probable cause to believe that on or about August 14, 2010, in the District of Maryland, JOHN FRANKLIN, DWAYNE FRAZIER, and TROY WILLIAMS, the defendants, did knowingly and willfully combine, conspire, confederate and agree to take from the person and presence of another, by force, violence and intimidation, and with intent to cause death and serious bodily harm, motor vehicles that had been transported, shipped and received in interstate commerce, in violation 18 U.S.C. § 2119, which offense is commonly referred to as carjacking, all in violation of 18 U.S.C. § 371.


MICHAEL GLENN
TASK FORCE OFFICER
BUREAU OF ALCOHOL, TOBACCO,
FIREARMS, AND EXPLOSIVES

Sworn to before me this
7th day of October, 2010.


JAMES K. BREDAR
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MARYLAND